

# Exhibit D

Confidential - Subject to Stipulation and Order of Confidentiality

1 - - -  
2 :SUPERIOR COURT OF  
:NEW JERSEY  
3 IN RE: :LAW DIVISION -  
PELVIC MESH/GYNECARE :ATLANTIC COUNTY  
4 LITIGATION :  
:MASTER CASE 6341-10  
5 :  
:CASE NO. 291 CT

6  
7       CONFIDENTIAL-SUBJECT TO STIPULATION AND ORDER OF  
8                   CONFIDENTIALITY

9 March 14, 2012

10  
11 Transcript of the continued  
12 deposition of DAVID B. ROBINSON, MD, called for  
13 Videotaped Examination in the above-captioned  
14 matter, said deposition taken pursuant to Superior  
15 Court Rules of Practice and Procedure by and before  
16 Ann Marie Mitchell, a Federally Approved Certified  
17 Realtime Reporter, Registered Diplomate Reporter,  
18 Certified Court Reporter, and Notary Public for the  
19 State of New Jersey, at the offices of Riker Danzig  
20 Scherer Hyland & Perretti LLP, Headquarters Plaza,  
21 One Speedwell Avenue, Morristown, New Jersey,  
22 commencing at 9:35 a.m.

23 - - -  
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1 director in Ethicon, you did not expect physicians  
2 to rely upon the IFU for the Prolift® as an accurate  
3 disclosure of the risks associated with the Prolift®  
4 system?

5 MR. GAGE: Objection.

6 THE WITNESS: No. I think what I  
7 said is I didn't -- they shouldn't depend on it as  
8 the sole source of their information regarding the  
9 Prolift® system.

10 BY MR. SLATER:

11 Q. My question is this: Did you expect  
12 surgeons who were considering using the Prolift® to  
13 rely upon the Prolift® IFU to accurately disclose  
14 the risks associated with the use of the Prolift®  
15 system?

16 MR. GAGE: Objection.

17 THE WITNESS: We should accurately  
18 represent what we knew to be risks at the time, yes.

19 BY MR. SLATER:

20 Q. You knew that was required by federal  
21 law. Right?

22 MR. GAGE: Objection.

23 BY MR. SLATER:

24 Q. By the FDA. Right?

25 MR. GAGE: Objection.